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IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

JEFFERY D. ALBRIGHT, NORMAN T.)
BOIRE, GARY M. DIETZ, WILLIAM H.)
ERDMAN, MICHAEL W. FRITZ,)
A. RONALD FROMBAUGH, RALPH A.)
HARRIS, ALLEN W. LANDIS, LOWELL)
MCGUIRE, WALTER R. MINICH,)
RAYMOND C. NEVINS, STANLEY L. NYE,)
VINCENT RAMIREZ, JR., KEITH E.)
SGRIGNOLI, RAY G. SNYDER, JR., and)
LAWRENCE D. WELKER,)

Plaintiffs)

v.)

DANIEL A. VIRTUE, Business Agent of the)
International Brotherhood of Teamsters;)
INTERNATIONAL BROTHERHOOD OF)
TEAMSTERS; LOCAL 776, INTERNATIONAL)
BROTHERHOOD OF TEAMSTERS; ABF)
FREIGHT SYSTEM, INCORPORATED,)

Defendants)

FILED
HARRISBURG, PA

NOV 19 2002

MARY E. D'ANDREA, CLERK
Per
Deputy Clerk

Case No. 1:CV-00-878
Judge Sylvia H. Rambo

DANIEL A. VIRTUE, Business Agent of the International Brotherhood of Teamsters,
INTERNATIONAL BROTHERHOOD OF TEAMSTERS; LOCAL 776
INTERNATIONAL BROTHERHOOD OF TEAMSTERS RESPONSE TO THE
PLAINTIFFS' MOTION FOR RECONSIDERATION OF MOTION FOR EXTENSION
OF TIME FOR DISCOVERY

1. Admitted.

2. Denied. The Defendants' lack knowledge as to when Mr. Mirin became aware of Ms. Chambers involvement. By way of further response, Defense Counsel for ABF has explained Ms. Chambers involvement in a timely manner upon Plaintiffs' request. It is specifically denied that Counsel's explanation was inconsistent with Mr. Rinburg's testimony.

WHEREFORE, Defendants respectfully request that the Court DENY the Plaintiffs' Request for Reconsideration.

Respectfully Submitted,

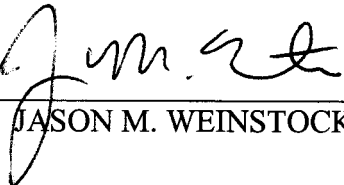
IRA H. WEINSTOCK, P.C.

800 North Second Street

Harrisburg, PA 17102

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By: _____



JASON M. WEINSTOCK

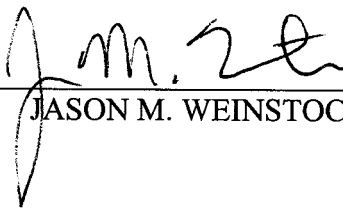
CERTIFICATE OF SERVICE

I, Jason M. Weinstock, Esquire, hereby certify that on this 19th day of November, 2002, a copy of Daniel A. Virtue, Business Agent of the International Brotherhood of Teamsters, International Brotherhood of Teamsters, Local 776 International Brotherhood of Teamsters Response to the Plaintiffs' Motion for Reconsideration of Motion for Extension of Time for Discovery served via first class mail, postage prepaid, on the following:

Robert S. Mirin
AHMAD & MIRIN
8150 Derry Street, Suite A
Harrisburg, PA 17111

Robyn Weiss, Esquire
MORGAN, LEWIS & BOCKIUS, LLP
1111 Pennsylvania Avenue, NW
Washington, D.C. 20004

By: _____



JASON M. WEINSTOCK